

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**ADAM WOOD,**

\*

**Plaintiff,**

\*

**v.**

\*

**Case No. 1:25-cv-01104-EA**

**UNITED STATES OF AMERICA,**

\*

**Defendant.**

\*

\*

\* \* \* \* \*

**DECLARATION OF WILLIAM L. HARRIS**

I, William L. Harris, declare pursuant to 28 U.S.C. Section 1746:

1. I am the Unit Chief of the Discovery Unit (DU) II of the Federal Bureau of Investigation (FBI), Office of the General Counsel (OGC), at FBI Headquarters, Washington, D.C. I have served in this capacity since March 2023. I have been employed with the FBI since September 1991.

2. The statements contained in this Declaration are based upon my personal knowledge, review and consideration of documents available to me in my official capacity, and on information obtained from other FBI employees.

3. DU II provides litigation support to other units within OGC, as well as numerous other entities. DU II is responsible for locating, reviewing, and processing for release any and all responsive materials which pertain to litigation and administrative matters in which the Bureau is either directly or indirectly involved. As Unit Chief of DU II, I am responsible for overseeing the Paralegal Specialists who locate, review, process, and produce documents related to a variety of document production requests.

4. I have access to the records contained in the FBI's Central Records System (CRS).

I am also personally familiar with the FBI records maintenance and retrieval system.

5. All records contained in the CRS are identifiable through the FBI's practice of indexing records to a particular subject matter or individual. Once indexed, a record pertaining to a particular subject matter or individual is retrievable through a search of the general indices to the CRS. In short, the CRS is the FBI's official system of records for all investigative, administrative, and official business of the agency.

6. The CRS enables the FBI to maintain information it has acquired while fulfilling its mandated law enforcement responsibilities. The records maintained here consist of administrative, applicant, criminal, personnel, and other files compiled for law enforcement purposes. Searching the CRS is the means by which the FBI can determine what retrievable information, if any, the agency may have in its files on a particular subject matter or individual.

7. As Unit Chief, I oversee the Paralegal Specialists who made a diligent search of the general indices to the CRS as of May 29, 2025. A search of the CRS located the following correspondence pertaining to a claim submitted to the FBI on behalf of plaintiff Adam Wood: a copy of a letter to Mr. Adam Wood from the Civil Division, Torts Branch, dated November 20, 2024, directed to the FBI, Office of the General Counsel, OTC - Civil Litigation Units; and a letter to Mr. Adam Wood from Civil Litigation II, Office of the General Counsel, FBI, dated January 30, 2025. True and correct copies of these letters are attached hereto as Exhibits A and B, respectively.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 29th day of May, 2025.

*William L. Harris*

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William L. Harris  
Unit Chief  
Discovery Unit II  
Office of the General Counsel  
Federal Bureau of Investigation

## Attachment A



Civil Division, Torts Branch  
Federal Tort Claims Act Staff

GKJ:HLSwann:hls  
157-16-NEW

*Post Office Box 888  
Benjamin Franklin Station  
Washington, D.C. 20044*

November 20, 2024

Mr. Adam Wood  
302 Hibiscus Street  
Taneytown, MD 21787

Re: Duplicate Administrative Tort Claims of Adam Wood

Dear Mr. Wood:

This is in response to your duplicate administrative tort claims dated October 1, 2024, which you submitted to the Department of Justice (Department). The Department and this office received the first claim by regular mail on October 4, 2024, and this office on October 8, 2024. The Department received the duplicate claim by electronic mail on November 13, 2024, via an inquiry by you to cfeedback@CIV.USDOJ.GOV.

Because your claimS concern an alleged tort involving the Federal Bureau of Investigation (FBI), I am forwarding them to that agency. All further communication on this matter should be directed to the FBI at the address listed below.

Very truly yours,

A handwritten signature in blue ink that reads "Hope L. Swann".

HOPE L. SWANN  
Paralegal Specialist  
Civil Division, Torts Branch

cc:  Federal Bureau of Investigation  
Office of the General Counsel  
OTC - Civil Litigation Units  
935 Pennsylvania Avenue, N.W.  
Room 10140  
Washington, D.C. 20535-0001

<b>CLAIM FOR DAMAGE, INJURY, OR DEATH</b>		<b>INSTRUCTIONS:</b> Please read carefully the instructions on the reverse side and supply information requested on both sides of this form. Use additional sheet(s) if necessary. See reverse side for additional instructions.	FORM APPROVED OMB NO. 1105-0008
1. Submit to Appropriate Federal Agency:  Department of Justice (DOJ) c/o the Federal Bureau of Investigation (FBI)		2. Name, address of claimant, and claimant's personal representative if any. (See instructions on reverse). Number, Street, City, State and Zip code.  Adam Wood 302 Hibiscus Street Taneytown, MD 21787	
3. TYPE OF EMPLOYMENT <input type="checkbox"/> MILITARY <input checked="" type="checkbox"/> CIVILIAN	4. DATE OF BIRTH [REDACTED]	5. MARITAL STATUS [REDACTED]	6. DATE AND DAY OF ACCIDENT 02/07/2024
7. TIME (A.M. OR P.M.) 6:05am			
8. BASIS OF CLAIM (State in detail the known facts and circumstances attending the damage, injury, or death, identifying persons and property involved, the place of occurrence and the cause thereof. Use additional pages if necessary).			
<p>The Federal Bureau of Investigation (FBI) - Boston and Baltimore Field Offices - did act with *negligence* and *discrimination* leading to an *abuse of process, abuse of power, and violation of claimant's civil rights* protected under the Constitution of the United States of America. The aforementioned sanctioned department of government and its CHS did engage in the *unlawful disclosure of classified information* to civilians resulting in *tortious interference* to the claimant's legitimate business.</p>			
9. <b>PROPERTY DAMAGE</b>			
NAME AND ADDRESS OF OWNER, IF OTHER THAN CLAIMANT (Number, Street, City, State, and Zip Code).			
NONE			
BRIEFLY DESCRIBE THE PROPERTY, NATURE AND EXTENT OF THE DAMAGE AND THE LOCATION OF WHERE THE PROPERTY MAY BE INSPECTED. (See instructions on reverse side).			
NONE			
10. <b>PERSONAL INJURY/WRONFUL DEATH</b>			
STATE THE NATURE AND EXTENT OF EACH INJURY OR CAUSE OF DEATH, WHICH FORMS THE BASIS OF THE CLAIM. IF OTHER THAN CLAIMANT, STATE THE NAME OF THE INJURED PERSON OR DECEDENT.			
Tortious Interference (2X), Civil Rights Violation(s); 4th Amendment and Title VII of the Civil Rights Act of 1964, Non-economic damages.			
11. <b>WITNESSES</b>			
NAME		ADDRESS (Number, Street, City, State, and Zip Code)	
Please see the attached witness list		Attached	
12. (See instructions on reverse).		AMOUNT OF CLAIM (in dollars)	
12a. PROPERTY DAMAGE NONE	12b. PERSONAL INJURY \$33,475,000	12c. WRONGFUL DEATH NONE	12d. TOTAL (Failure to specify may cause forfeiture of your rights). \$33,475,000
I CERTIFY THAT THE AMOUNT OF CLAIM COVERS ONLY DAMAGES AND INJURIES CAUSED BY THE INCIDENT ABOVE AND AGREE TO ACCEPT SAID AMOUNT IN FULL SATISFACTION AND FINAL SETTLEMENT OF THIS CLAIM.			
13a. SIGNATURE OF CLAIMANT (See instructions on reverse side).  <i>Adam Wood</i>		13b. PHONE NUMBER OF PERSON SIGNING FORM [REDACTED]	14. DATE OF SIGNATURE 10/1/2024
CIVIL PENALTY FOR PRESENTING FRAUDULENT CLAIM		CRIMINAL PENALTY FOR PRESENTING FRAUDULENT CLAIM OR MAKING FALSE STATEMENTS  Fine, imprisonment, or both. (See 18 U.S.C. 287, 1001.)	
The claimant is liable to the United States Government for a civil penalty of not less than \$5,000 and not more than \$10,000, plus 3 times the amount of damages sustained by the Government. (See 31 U.S.C. 3729).			

**INSURANCE COVERAGE**

In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.

15. Do you carry accident insurance?  Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number.  No

16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible?  Yes  No 17. If deductible, state amount.

**NONE**

18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).

**NONE**

19. Do you carry public liability and property damage insurance?  Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code).  No

**INSTRUCTIONS**

**Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.**

**Complete all items - Insert the word NONE where applicable.**

A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE, AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY

**Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.**

If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.

The claim may be filled by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.

If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.

DAMAGES IN A **SUM CERTAIN** FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN **TWO YEARS** AFTER THE CLAIM ACCRUES.

The amount claimed should be substantiated by competent evidence as follows:

(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.

(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested concerns, or, if payment has been made, the itemized signed receipts evidencing payment.

(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.

(d) **Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.**

**PRIVACY ACT NOTICE**

This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.

- A. **Authority:** The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.

- B. **Principal Purpose:** The information requested is to be used in evaluating claims.  
 C. **Routine Use:** See the Notices of Systems of Records for the agency to whom you are submitting this form for this information.  
 D. **Effect of Failure to Respond:** Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."

**PAPERWORK REDUCTION ACT NOTICE**

This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Torts Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.

October 1, 2024

Dear Director,

My name is Adam Wood. The below will enumerate, iterate, and codify who I am, what has occurred, where it occurred, why it occurred, and the steps I've taken to remedy the matter to date.

**Summary**

It has been **eight (8) months** since the civil rights of my family were violated. To the best of my knowledge, it has been **fourteen (14) months** since the classified information associated with this matter was propagated in the public square by federal agents from the Boston Field Office and/or their CHS's. Since then, former USG executives that I'd hired to support the USG from the Goldman Sachs/NSC, CSEL - NSA/CYBERCOM/DIA/SPACERCOM, and SIS-4 - CIA have moved on with their lives unscathed with one of the representatives assuming responsibilities as the Deputy Director of USSOCOM. Whereas, I, a US citizen, have had my life upended; e.g., business destroyed, reputation damaged seemingly irreparably, and have yet to even receive communications concerning my computer and cell phone.

Like you, I am American and I do not want to smear or stain my government whom I've tried so desperately to help. I have not notified the news media nor have I notified Congress, but I am struggling given the extent of the damages incurred. I deserved better than this. We all deserve better than this. As you may or may not know, I left Harvard University to help the USG. I rejected offers of employment from many organizations, including Robert Downey Jr. to support the USG. **No remedy has been offered or even discussed in eight (8) months. This is unacceptable.**

I do not take the filing of the SF95 lightly as it includes injuries that include negligence, discrimination, retaliation, tortious interference, and the violation of civil rights. It also includes a witness list of now over 100 names of government officials many of whom I know personally and do not want to drag their names through the mud. It is my hope that your office will consider the facts outlined herein. I have acknowledged that we all have a job to do and that there is a process relative to the execution of those duties. That said, I submit to you the following, because if this type of event can happen to me, I am deeply concerned about what that represents for the justice of others.

Respectfully,

Adam Wood

### INTRODUCTION

I'll be direct relative to the purpose of this note just as I have also notified Special Advisor for Cybersecurity to Director Wray, William "Mike" Herrington, Section Chief and Liaison to NSA/CYBERCOM, Mr. Jason Bilnoski (JB), and Assistant Director for Counterterrorism, Mr. David Scott (DS) regarding this matter. These discussions took place on 2/10/2024 (DS) and 2/20/2024 & 2/26/2024 (JB) and were based off of my notes memorialized following a two-hour plus long interview at my home in Maryland following a full-scale, military-style raid on the morning of February 7, 2024.

Empirical evidence was never what this matter was about. What it was always about was cyber intelligence that two (2) counterterrorism agents at the Boston Field Office didn't attempt to corroborate with SMEs gathered from technology that they are not qualified to understand. So what did they do? They asserted that the cyber intelligence pen-tested by TAO/CNO at NSA in 2018 was fake. When that explanation wasn't sufficient, they asserted that the technology was designed to deploy malware and spyware into USG systems absent evidence. Then they defaulted to calling the technology dangerous. They didn't contact FBI HQ to speak about the nature of SST's history of engagement with the FBI, NCIJTF, NSA, CIA, DOD, DOC, etc. They didn't speak with SMEs despite noting in person that they were, "Not computer people."

They didn't do anything even remotely close to what would qualify as conducting basic research concerning my education (Harvard University | Tufts University), professional history (Harvard Law School, National Bureau of Economic Research, Harvard Innovation Lab, Johns Hopkins, United Nations Secretary General work via UNITAR, Robert Downey Jr. and the DOD, US Navy), professional contacts, etc. As a US Citizen, whose home they justified raiding on the basis of their fears, arrogance, and incompetence. This level of incompetence is dangerous. Had any attorney from FBI HQ's OGC reviewed the justification and subsequent correspondence from Boston, they'd almost immediately object to the language used as it's anchored in speculation, hearsay, conjecture and prejudicial bias towards a foreign national of Israeli and Australian descent, Eden Levinson, whom the Special Advisor to Director Wray, Mike Herrington met on multiple occasions and was permitted in FBI spaces in April of 2022. The Boston Field Office did not coordinate any communications to validate the historical facts of the company and the lack of expertise in AI and cybersecurity stated by SA Paul Garaffo on February 7, 2024, demonstrates that oversight has once again failed.

Since February 7th, I have been harassed by local law enforcement, sneered at by my neighbors, and lost all business. I have not slept

through the night as I am constantly awoken by nightmares of what occurred on the morning of February 7th. The worst part of the situation is that the trust I held in my government has been broken. I am not the same person I was on February 6th.

That said, I have a family. I've tried to be measured and diplomatic throughout this matter. I have teenagers and pets and in-laws all of whom witnessed a grave injustice on the morning of February 7th both in person and captured on several video cameras inside and outside the house. Given the excessive show of force and tactics employed that day, when I'm asked by my 18 year old son that I've prepared for college and public service, "Why are they so bad at their jobs? They didn't know anything about you?" That, right there, I can no longer defend the FBI regardless of how much I revere the institution. I could have contacted the ACLU, Anti-defamation League, USAO, Congress, and sent the videos and this story to any major news media outlet. I did not do any of those things as I do not want any more stains on the FBI or the IC.

That said, we deserve an acceptable resolution and apology for this incident as does my family. Historically, the world has naturally been unkind to new technology, new talent. That's no excuse for what has occurred.

## FACTS

### Background

- From October 2021 through May of 2022, I introduced several high ranking members of the FBI's WFO/HQ - some of whom reported to the DAG, SESSs at the Secret Service and Department of Homeland Security, and the Department of Defense to novel technology behind the firewalls of our primary adversaries.
  - This technology was created between 2013 and 2014 and established access to the infrastructure of the CCP, Russia, Iran as well as their surrogates critical infrastructure.
  - NSA's TAO/CNO pen-tested this technology in 2018-2019 and recommended that retired senior military officers establish a company in the United States to serve the USG exclusively.
  - In October and November of 2021, I notified the FBI's HQ that this capability had come to my attention and that I recommended it be seen/vetted by the Bureau and CIA.
  - The FBI's top cybersecurity advisor, William Herrington, to Director Wray met with the creator of this technology, Eden Levinson, in December of 2021 in the DMV and spoke

- frequently via Signal. I set this meeting up via Assistant Director of Counterterrorism, David Scott, FBI.
- The FBI WFO/HQ invited myself, Eden, and other members of our team to brief in April/May of 2022 in the DMV and cited a potential IAA as a pathway forward to support the FBI, NSA, and CISA, via the NCIJTF.
  - The JIATF-S was also interested in leveraging the tools to disrupt cartel infrastructure and the obfuscation of the CCP's fentanyl distribution points across the US.
  - HAF/SAF CDM and the DIA's Strategic Competition Group knew of these efforts and sat with me on February 10, 2024, in Los Angeles with Robert Downey Jr., his wife, Susan Downey, and other members of his leadership to discuss helping the USG in combatting the CCP's narrative.
  - SOCOM executed a CRADA at the recommendation of JSOC in March of 2023 with JSOC noting that the capabilities should be scaled to all TSOCS.
  - I served on a joint forces innovation panel the morning the CRADA was executed with LTG Donahue and GEN Fenton at the USF - Dragon's Lair 8.
  - Lt Gen Harris of the USAF Futures tapped A5/7 FIT/CDT and the 16<sup>th</sup> AF to run extensive due diligence from June 2023 - April of 2024 resulting in the technical director stating that the capabilities should be deployed enterprise-wide.
  - From January 2024 - July of 2024, with the aid of Scott Stalker, retired CSEL at DIA/NSA/CYBERCOM/SPACERCOM, the USMC's Maj Gen Heritage, Maj Gen Matos, several SESSs, and CSELS, stated that the capabilities should be leveraged for a global shaping operation, invested in Service-wide, and taken to every COCOM.
  - The CTO of the DON agreed.
  - Commerce's BIS actioned a pilot program in January of 2024.
  - From April of 2024 - July 2024, the CIA validated endpoints and web access points to verify gaps in current capabilities and moved to dedicated communications devices internally with the Technology Management Office and Agency leadership.
  - Members of the team included retired SOF, NSC, CSEL, SIS-4, and general officers.

I was never paid by the USG for any of this work. As a matter of fact, I took out loans from friends and family to support the USG.

THEN; February 7, 2024, the FBI's Boston and Baltimore Field Offices raided my home in Maryland:

- The Special Agent at the center of this case is Paul Garaffo of the Boston Field Office.
- Based off of interviews with former classmates of SA Garaffo, now attorneys, he has a documented history of overreach and utilizing any piece of circumstantial evidence to justify the

aforementioned, including leveraging unreliable information from CHSs.

- SA Garaffo and his CHS have spoken about the details of this sealed NSI to civilians who then placed that information into the public square resulting in quantitative damages dating back to August of 2023, at a minimum. I am speaking to only what I can prove and limiting myself to facts.
- SA Garaffo's first statement to me at my dining room table on the morning of 2/7/2024 was, "I am 110% confident that this intelligence is fake."
  - When asked if he coordinated any validation of the intelligence with the Cyber Division in Washington his response was, "No. We haven't spoken to anyone there."
  - Well, that could have prevented this entire ordeal, but since he failed to communicate - a basic skill - here we are.
  - This is negligence.
- Over the course of the next two (2) hours, I educated both he and SA Jared McCarthy on facts entered into the record below.
  - SA Garaffo was particularly arrogant in how he handled his questioning knowing nothing about my personal background, SST's capabilities, and history of the company itself including interactions with the WFO, CIA, and LTG Tovo, among other highly-decorated senior Army officers and SOF.
- Previously written, based on a phone call dated March 25<sup>th</sup>, SA Garaffo's memory has lapsed.
  - There was a clear and intentional delay in progress as were answering questions asked and answered several times.
  - SA Garaffo said then, "It's possible that we may have received some bad information."
  - There's been no accountability from the Boston Field Office nor Baltimore.
- Boston Field Office leadership has been complicit, allowing this investigation to continue despite the facts running counter to the assumptions posed, and yes, SA Garaffo has used verbiage in his emails such as "most likely" "we assume" and "presumably" with respect to Eden Levinson's relationship with the IDF, 8100, 8200, etc., none of which was true and therefore borders on discriminatory practices based solely on the allegation of the aforementioned, which, again, was never true or even remotely germane to this matter.
- SA Garaffo's speculation borders on the pathological most closely aligning with the Dunning-Kruger effect. I reiterate, this SA is dangerous as he has failed to conduct baseline research required to arrive at fundamental logic and reasoning - NEGLIGENCE that resulted in significant injury.
  - SST came to my knowledge in October of 2021.
  - The first person contacted as a result, Mr. David Scott, who then placed us in touch with Special Advisor to Director Wray, Mr. Herrington, as well as the SESSs within the NCIJTF.

- o I ensured that CIA leadership tracked those communications due to venue.

I want to know what rational line of logic is realized when a person who has spent over a hundred thousand dollar on their education to put themselves in a higher level of competence to help the USG on matters of workforce development and workforce augmentation then goes directly to the FBI to attempt to defraud the nation's premier law enforcement agency and the CIA? I want to know what type of person turns down an Academy Award Winning Actor in Robert Downey Jr. to, at his own detriment, continue trying to help the USG understand the full scale of the capabilities and 702 support? The logical explanation is that no one with my education, experience, and contacts would do that.

#### **ADDITIONAL BACKGROUND**

- SA Garaffo stated on Monday, March 25, 2024, that, "It is possible that we, the FBI Boston Field Office, may have received bad information."
- As of April 8, 2024, he stated that he's speaking with various aspects of the U.S. Government about this matter, thus causing more damage - tortious interference.
  - o There is no basis for qualified immunity here - none.
  - o SA Garaffo and/or other federal agents leaked classified information to the public - known in August and September of 2023, but potentially prior to the confirmed timeline.
- SA Garaffo threatened to "charge" me with making False and Misleading Statements if I continued to attempt to offer explanations that appeared to run counter to his personal beliefs on the matter versus evidence, factual chronology of events, and material changes in circumstance over the 2 ½ year period of my direct involvement with SST.
- As a result, SA Garaffo and the Boston Field Office have opened the FBI up to significant exposure and legal recourse.

As stated, it has now been eight (8) months since the initial engagement with the Boston Field Office at my home with the tactical team from Baltimore on the morning of February 7, 2024, at 6:05am EST. I understand that there is a defined process associated with matters such as these; however, given the two and a half year history, dating back to October of 2021, of discoverable - documented, verifiable, and direct - communication between SST and the Washington FO (FBI HQ), the extensive interagency cooperation/validation of the authenticity concerning the technological capabilities with SMEs between the DOD, NSA (TAO/CNO), DHS, and DOJ with respect to the FOCI CI Assessment requested/conducted/accepted/cleared to proceed in April of 2022, and discoverable communication between all of the aforementioned parties with CIA to ensure proper visibility, communication, and venue concerning specific threats to the U.S. and its citizens, I am reaching out to assess an appropriate, end-state and pathway forward to resolve this matter.

Additionally, given the amount of time that's passed since SST was cleared of any and all FOCI questions and provided permission to proceed, I'd be remiss to note that, upon the conclusion of the CI Assessment in April of 2022, initiated/assessed/cleared to proceed by the NCIJTF and the JAIC - now CDAO, it was our understanding that SST had cleared an otherwise significant hurdle as not only no points of concern were raised by the investigative authorities conducting the assessment in Washington, but that all parties were given the all clear to proceed to engage in official business by the Security Offices at FBI Cyber and DOD. Subsequently, the Washington FO had expressed interest in discussing an IAA between the Bureau (Cyber), NSA/CYBERCOM, and CISA to pilot the capabilities observed - in person - over a duration of over six (6) months in duration prior to the Section Chief of Cyber going TDY (Mike Herrington, now Special Advisor to Director Wray) - all of which can be confirmed via email exchanges between Adam Wood ([adwood@law.harvard.edu](mailto:adwood@law.harvard.edu) [adamwood@fas.harvard.edu](mailto:adamwood@fas.harvard.edu) [adam.wood@sst-corporation.com](mailto:adam.wood@sst-corporation.com)), Eden Levinson, Ms. Sarah Pham, Ms. Shani Spivak, and Mr. David Scott's tapped SESSs.

The Boston Field Office - leadership and agents - were not aware of any of the above, because they simply did not communicate with the WFO Cyber Intelligence leadership nor the Intelligence Branch (IB), nor any other member of the IC, such as the CIA nor the NSA, nor the Pentagon. Had they done so, they would have been able to successfully corroborate the validity of SST's intelligence and FOCI mitigation produced via the Special Security Agreement (SSA) as well as the history of SST's documented cooperation with the WFO and DOD via FBI Cyber leadership to dispel any reasonable notion of a potential FCA violation or any other law for that matter. Furthermore, given the stated lack of domain expertise relative to computer literacy to validate such intelligence and cyber threats from SA Garaffo and SA McCarthy on the morning of February 7, 2024, the conclusions made in reference to the above were predicated upon assumptions anchored in speculation, hearsay, conjecture, and prejudicial bias are spurious at best. As such, there was no merit to conduct a search and seizure of a US Citizen's property and domicile as there was no evidence to support reasonable suspicion let alone probable cause and threats to national security to obtain said warrant.

The concerns outlined above and below demonstrates a pattern of tactics employed by the Boston Field Office agents and approving leadership that goes beyond general incompetence, which, in and of itself is dangerous enough across a spectrum of damages and other injuries. The bottom-line is that there are myriad of actions that have been taken in this matter by the Boston Field Office that rises to the level of abuse of power and abuse of process - among other infractions including government waste, misconduct, and civil rights violations that were not and are not justifiable in this case.

The Boston Field Office was also unaware as to the;

- Personnel on SST's team, to include;

- Former NSC - Director of DOD Intelligence and now Deputy Director of USSOCOM
- CSEL of NSA/CYBERCOM/DIA/SPACECOM
- SIS-4; CIA; and,
- Other senior and General Officers, LTG Tovo, Johnny Sawyer, and others.
- Existence of SST's corporate website (Yes, the agents didn't look at the company's website - they stated this on the morning 2/7/2024)
- Educational background of the COO (me) whose home/family was raided on February 7, 2024, in Maryland; and,
- My affiliation(s) and work with/at Harvard, Tufts, Johns Hopkins, the USG, Hollywood - Academy Award Winning Actor and associates, and the United Nations, because they didn't conduct research on LinkedIn, shoot me an email, or give me a call.
  - It wasn't until they saw my Harvard and Tufts IDs in my wallet that they decided to ask those questions.
- Costs of frozen/cold storage relative to cloud services
- How data lakes function
- How in-line collection and query inputs produces intelligence returns/analysis associated with those outputs
- A host of additional relevant data points germane to an investigation requiring evidence derived from basic research and the standard of due diligence
  - **They knew nothing and conducted a raid on my home as a "first step fact-finding mission."**
    - Yes, I'm quoting them.
    - Had they conducted a Google search on my name, they could have acquired all of this information - that is negligence.
    - At that point, you don't have reasonable suspicion let alone probable cause to do what was done here - that is abuse of process, abuse of power, and a violation of the 4<sup>th</sup> Amendment.
  - They knew nothing and it's not because they just operated off of poor information; it's also based in part that they did not research anything to corroborate or disprove that information, and most importantly, they did not communicate with FBI HQ, the POIs, or any relevant party.
  - Their actions - and those who approved of those actions - were incredibly reckless and could have resulted in a loss of life at my home.

It is because of these actions that I have no faith nor confidence in the Boston Field Office's abilities to conduct a legitimate legal investigation. I have also lost faith in the WFO given their unwillingness to intervene when they knowingly engaged with and used SST dating back to October/November of 2021. Due to their lack of general competence, willingness to skirt the laws this nation was built upon, and place civilians and their families in imminent danger

- civilians whose only objective is to support the national security interests of the USG - this matter must be escalated to a higher authority for oversight and security.

I say again, had the Boston Field Office conducted a cursory review of the above bullet points, that office could have avoided the need for obtaining search warrants, thus eliminating additional resource-intensive activities associated with the government serving those warrants, and conducted a more discreet and thorough investigation to reduce the extent to which those activities could potentially otherwise result in significant damages to the USG, end-users within the USG, SST, and its personnel. For whatever reason, they chose to go a different route and that route resulted in significant damages.

Further review, on February 6<sup>th</sup>, 2024, the Boston Field Office obtained search warrants for probable cause under seal applying national security for the basis of the aforementioned request, therefore preventing disclosure under the Freedom of Information Act. However, during the week of September 4<sup>th</sup>, 2023, a civilian notified me of the company concerning an ongoing FBI investigation (no specific field office was mentioned) citing the specific allegations relayed on February 7<sup>th</sup>, 2024, during the interview portion of the BFO search. What this evidence suggests is that - regardless of merit - either a) personnel from the Boston Field Office were openly discussing an ongoing national security investigation (NSI) with civilians, yet still found it appropriate to make requests for warrants under seal from a court of law or b) the CHS was openly discussing a NSI to others in the public. Either way, both A&B are illegal. **This disclosure is unlawful** and adds to the basis for a complete and thorough investigation into the agents and their leadership at the Boston Field Office as their actions are antithetical to the fidelity typically employed by the Bureau as a whole. These facts are concerning, and, although our position has consistently been, and continues to be one of support and abiding respect for the Bureau as an institution and its mission, it is irrefutable that the agents in question from the Boston Field Office have contributed to government waste, engaged in misconduct, abused their power and process, and violated the civil rights of a US Citizen in the process.

In summation, I state the following in the most tactful and diplomatic tone possible given the harrowing nature of the circumstances. Based off of the information exchanged and actions taken by the Boston Field Office to date, the Boston Field Office's understanding of SST origins, its technological capabilities, personnel, and painstaking efforts to support the U.S. government appears to be radically different than the foundation of facts vetted over the past six (6) years by various sanctioned departments of the U.S. government and, more specifically the six (6) months in duration w/FBI HQ from mid-October of 2021 to late-April of 2022 wherein SST routinely communicated and met with FBI HQ.

I am, and have been, equally confused about the substance of this case given the magnitude of due diligence conducted and the extent of the company's engagements by/with the U.S. government since 2018. I am even more confused and equally concerned with the fact that the Boston Field Office's CHS's claims, which lacks merit and supplied no concrete evidence clearly ignited unfounded assumptions that have contributed to speculation, conjecture, and hearsay easily disproven and was over two (2) years ago. The aforementioned claims have resulted in deliberate interference with, and significantly damaged SST's legitimate business operations in serving the USG's national security interests, which have been seriously undermined as a direct result of the mere existence of this case, but includes the disclosure of this NSI to civilians with no need to know dating back to August of 2023. At present, the damage done is both severe, quantifiable, and no longer tolerable.

Despite these facts and the sense of urgency that should otherwise be associated with those facts - preventing tragedies - given the value inherent in the institutional memory established and equal weighted value placed upon our relationships with the Bureau, we wanted to be respectful and afford the Boston Field Office some latitude to conduct and conclude this matter without intervention from FBI HQ - who we've been in contact with on this matter several times since February 10, 2024, and as recently as April 8, 2024 (Mike Herrington and David Scott via email).

I would hope that the Department of Justice would agree that we seek to serve the same mission as we have demonstrated our commitment to the same purpose time and time again - for years. It is clear to me now that the Boston Field Office has refused to accept that reality. That is not a reflection on the DOJ, rather that is a function of that specific office's own choices, not of evidence-based reality itself. Despite that, the FBI must be held accountable when it destroys the lives of the very citizens it swore an oath to protect. I am open to a discussion to resolve this matter and look forward to having that opportunity.

Very Respectfully,  
Adam Wood

**Initial Basis of SF95 Complaint: Negligence, Discrimination, Tortious Interference, Emotional Distress**

**COUNT I (TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS)**

1. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through

2. Plaintiff had beneficial business relationships with the Department of Defense, the Intelligence Community, the Department of Commerce, and other sanctioned departments of the United States Government.

3. Defendant knew of these business relations.

4. Defendant intentionally interfered with Plaintiff's business relations for an improper purpose and by improper means.

5. Plaintiff was harmed by this interference.

**COUNT II (TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS)**

6. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through

7. Plaintiff had a contractual relationship with SPECIAL SUPPORT TECHNOLOGIES' prospective investors.

8. Defendant knew about this contractual relationship.

9. Defendant intentionally interfered with Plaintiff's contractual relationship for an improper purpose and by improper means.

10. Plaintiff was harmed by this interference.

**COUNT III (INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS)**

11. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through

12. Defendant intended, knew, or should have known that his conduct would cause Plaintiff emotional distress.

13. Defendant's conduct was extreme and outrageous, beyond all possible bounds of decency and utterly intolerable in a civilized community.

14. Defendant's conduct caused Plaintiff emotional distress.
15. The emotional distress caused was severe and of such a nature that no reasonable person could be expected to endure it.

**COUNT IV. (DISCRIMINATION - CIVIL RIGHTS ACT OF 1964)**

16. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through
17. Plaintiff had a contractual relationship with SPECIAL SUPPORT TECHNOLOGIES' prospective investors and US government.
18. Defendant knew about this contractual relationship.
19. Defendant intentionally discriminated against the Plaintiff's legitimate business activities relationship for an improper purpose and by improper means.
20. Plaintiff was harmed by this discrimination.

**SUMMARY of DAMAGES - AGGREGATE to COMPANY and PERSONNEL**

The sum total of personal damages would equal \$33,475,000.00.

**BASIS:** Longstanding and quantitatively-based precedent of government awards provided to vendors for enterprise-wide capabilities. Evidence supporting the desire of the aforementioned can be corroborated via witness testimony, written communication (emails) and text messages (Signal), ROMs - Actioned, and additional testimony as needed with respect to the Department of the Navy, including the Marine Corps, as well as the Department of the Air Force, Department of Commerce, National Security Agency, DARPA, SOCPAC, SOCCENT, PACOM, SOUTHCOM JIATF-S, USD (I) Hard Targets, Department of the Treasury - OFAC, and others within the IC.

- That witness list of 105 people - minimum.
- The witness list is not exhaustive.
- The list of witnesses was compiled in under five (5) minutes.
- A majority of the parties would testify that they expressed - in writing and/or verbally - of their desire to field SST's capabilities enterprise-wide, Service-wide, or Department-wide, and/or had actioned paid pilot programs or made introductions to parties who had expressed interest in the same.
- Stated evidence can be corroborated via documented written communication between the Claimant and witnesses exchanged via email, text messages, and joint testimony from former employees.

**Claimant Witness List**

1. David Scott, Assistant Director Counterterrorism, FBI
2. William "Mike" Herrington, Special Advisor to Director Wray, FBI
3. Sarah Pham, Special Agent, FBI
4. Shani Spivak, Intelligence Branch, FBI
5. Matthew Pedersen, Deputy Director - SOCOM (former NSC)
6. Laura Smith, CIA
7. Maura Burns, Chief Operating Officer - CIA
8. Mr. Lyons, Deputy Director (SAC) - CIA
9. TD R MC, CIA
10. TD C MC, CIA
11. Alex, Chief (TMO) - CIA
12. Lt Gen Harris - USAF Air Force Futures
13. MAJ David Zumbach - USAF A5/7 FIT/CDT
14. Ethan Crouse - MITRE Procurement and Acquisitions
15. Jon Stevens - USAF Acquisitions
16. Geoffrey Irving, Deputy General Counsel - DOC BIS
17. Justin Fanelli, Acting CTO - Department of the Navy
18. Master Guns Hollingshead, CSEL JTF ARES MARFORCYBER
19. MajGen Matos, CG MARFORCYBER
20. MajGen Heritage, Director of Operations - CYBERCOM
21. James Slater, J9 USMC/NSA
22. Shery Thomas, SES - USMC
23. CPT William Schimmel - USAF
24. Tony Porter, GG15 - UASF HAF/SAF CDM
25. COL Johnny Barnes - USAF
26. Gabriel VAUGHAN, Technical Director - USAF 35<sup>th</sup> AF/ACC
27. Brian Cook, Technical Director - USAF 16<sup>th</sup> AF
28. MAJ Jeremy Santino - USAF A5/7 FIT/CDT
29. Kimberly Carberry, PEO Lead - SOCOM
30. Doug Scott - ONA Capital
31. Ian Chrone - DARPA

32. Frank Sanders - USD (I)  
33. Theresa Whalen - USD (I)  
34. Jacqueline Page - USD (I)  
35. Tom, Adviser to CG - JSOC  
36. Terry, Adviser to MG Leahgy - CENTCOM  
37. Jon Rice, SIS-4 - CIA  
38. Scott Stalker - USMC CSEL NSA/CYBERCOM/CSS/DIA/SPACECOM  
39. Keith Couch - USMC  
40. Theresa Shea, NSA (Ret)  
41. Theresa Garner  
42. Mary Garner  
43. Malaki Saunders  
44. Armoni Ani  
45. General Allen - USMC (Ret)  
46. LTG Charlie Moore - USAF (Ret)  
47. LTC Chris Wood - USAF USD (I)  
48. Robert Dela Rosa - DIU  
49. Amanda Heller - DIU  
50. Noah Smith, Advisor to Director of NSA and PACOM  
51. Scott Salkeld - NSA C-Outcomes  
52. Pappy - NSA C-Outcomes  
53. Tracy - NSA C-Outcomes  
54. David Breed  
55. Hondo Guerts - USN  
56. Jake Windle - USN  
57. Aaron Windle - USN  
58. Tom McGuire - NSA  
59. Tim Teal - NSA  
60. Mark Mitchell - USA  
61. Johnny Sawyer - DIA Chief of Staff  
62. LTG Ken Tovo - USA  
63. MG Buck Elton - USAF  
64. MG Todd McCaffrey - USA  
65. COL Ross Davidson - USA  
66. COL Ron Minty - USA  
67. Sergeant Major Miguel Filpo - USA  
68. Amyn Jan, Chief Strategist - CIA S&T Directorate  
69. Dimitri Kusenov - DOE/DHS Undersecretary  
70. Khoi Nguyen - NSA  
71. LCDR Michael Klimkowski - USN  
72. Jock Padgett - DOD/CTO XVIII ABC  
73. Jeffrey Havlicek - SOUTHCOM JIATF-S CTO  
74. David Rader + Director of CFIUS - DOD  
75. BG Michelle Link - USA  
76. Nicholas Vandre - USA JSOC  
77. Michelle Isbell - USA JSOC  
78. Chris Humphrey - USA JSOC  
79. Lisa Sanders - SOCOM Director S&T  
80. CPT Chris Clarkin - USA  
81. SFC Bill Wilder - USA  
82. LTC Dustin Murphy, General Counsel - USASOC  
83. Rafa Sampayo - USA

84. COL Winfield Atkins - USA  
85. Scott McKeithen - USAF  
86. Neil Chaudry - DOI/DHS/GSA  
87. Malcolm - ONA Capital  
88. Stephanie Belistri - CIA New North Ventures  
89. Doowan Lee - USA  
90. Alex Creswell - GCHQ/MI5  
91. Sir Jeremy Fleming - GCHQ  
92. Scott Sperling - Lockheed Martin  
93. Robert Chung - Google  
94. Andy Kemp - HP + random law enforcement group\*  
95. Jason Porter - USA  
96. Charles Derrick - USA/Deloitte  
97. Damon Stern - SOCOM  
98. Quintan Wiktorowicz - MITRE  
99. Team CYMRU - Various members  
100. Morgan 6 - Various members  
101. Edge Theory - Various members  
102. Flashpoint - Various members  
103. Trellix - Various members  
104. Dark Wolf - Various members  
105. Radiant Technologies - Various members

**Swann, Hope (CIV)**

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**From:** Johnson, Gail K. (CIV)  
**Sent:** Friday, November 15, 2024 7:07 PM  
**To:** Swann, Hope (CIV)  
**Subject:** FW: [EXTERNAL] Re: FW: SF95 Update  
**Attachments:** SF95 DOJ.pdf; 1OCT2024.docx

Hope: Please process right away and transfer to the FBI. Thanks.  
Gail

**From:** Adam Wood <adam.wood@gf-ac.com>  
**Sent:** Friday, November 15, 2024 4:21 PM  
**To:** Johnson, Gail K. (CIV) <Gail.K.Johnson@usdoj.gov>  
**Subject:** Re: [EXTERNAL] Re: FW: SF95 Update

Thank you, Ms. Johnson.

I understand, and respect the process/institutional norms, germane to agency review and adjudication concerning FTCA claims. However, the Bureau was extended multiple courtesies over an eight (8) month period and could have short-circuited what occurred here, thus minimizing the extent of the damages incurred. They chose not to do that, so I no longer have a high degree of trust and confidence in the FBI to do the right thing, which is unfortunate given what the DOJ should want to learn in my supplemental document.

That said, please see the attached SF-95. This is the same form that I have delivery confirmation for from October 4, 2024. I do not wish for the DOJ to have staff members running around the Department looking for this piece.

I've also re-attached the supplemental document that is referenced in the SF-95 with my witnesses as well as a detailed account of what occurred here. Ms. Johnson, I have remained silent on this matter for a variety of reasons, not the least of which was to spare the Department embarrassment. I think that we as citizens need to be a bit more compassionate with respect to how we communicate injustices, which is why I reached out one final time on 11/13/24. I appreciate your communication and willingness to ensure that this matter be properly remedied.

Respectfully,

Adam Wood

On 11/15/24 3:51 PM, Johnson, Gail K. (CIV) wrote:

Dear Mr. Wood:

Thanks for that information. Every agency has authority to review and adjudicate FTCA claims. The agency that allegedly caused the harm is the appropriate agency. Here, it seems that the FBI is the agency that caused your harm.

Case 1:25-cv-01104-EA Document 22-2 Filed 06/02/25 Page 25 of 47  
To date, I have not been able to locate your Standard Form 95. I will enlist the assistance of a few others to see if this office ever received it. I am not sure how you addressed it. If/when we ever locate it, we will transfer it to the appropriate agency for handling, per our regulations.

Take care and enjoy the weekend,

Gail

Gail K. Johnson  
Supervisory Trial Counsel  
U.S. Department of Justice  
Federal Tort Claims Act Section  
Torts Branch, Civil Division  
Washington, D.C. 20044

**From:** Adam Wood <[adam.wood@gf-ac.com](mailto:adam.wood@gf-ac.com)>  
**Sent:** Friday, November 15, 2024 3:43 PM  
**To:** Johnson, Gail K. (CIV) <[Gail.K.Johnson@usdoj.gov](mailto:Gail.K.Johnson@usdoj.gov)>  
**Subject:** Re: [EXTERNAL] Re: FW: SF95 Update

Good Afternoon Ma'am,

The SF95 that was delivered to the Civil Branch on October 4, 2024, was properly executed and included the date of injury, federal agency, sum certain, etc. If it would be helpful, I can print out another SF-95, execute it, deliver it in-person, and provide any additional materials needed.

The FBI, whom I worked with in the past - the WFO/HQ (SESSs and Assistant Director or higher) - knew about the harm caused by the FBI's Boston and Baltimore Field Offices yet elected to remain silent even after I told them what happened via telephone, email, and text message. Given they have remained silent since the date of injury, I expect no change in their course of action.

What is equally concerning about remitting an SF95 directly to the FBI now is that they buried my case. As referenced in my documentation, the special agents from the field offices did no research into who I am/was prior to executing their warrant. There was no evidence to support the basis of their initial assumptions, which is the term they used. I counseled those agents at my dining room table for over two (2) hours and when I asked them what their endgame was, one of the agents said, "We're going to need a day." It has been 282 days, and since that day, my entire business and relationships with CIA, NSA, DOD, DOC, and others have vanished.

As I noted in my supplemental document, given the DOJ's jurisdiction under the FTCA, and the FBI's negligence and time lapse, I am deeply concerned that no one within the Bureau will pay attention to the extent of the abuse that took place.

Please let me know what you'd like me to do going forward.

V/R,

Adam

On 11/15/24 3:13 PM, Johnson, Gail K. (CIV) wrote:

Dear Wood:

Thank you for your response. Unfortunately, the SF-95 that you submitted was not complete and did not provide, among other things, the “appropriate federal agency” that is the subject of your claims, the date the injuries occurred, nor did it have a sum certain, and it was not executed. Your supplemental document seems to indicate that the principal federal agency is the Federal Bureau of Investigation. It is critical that we determine which federal agency/ies allegedly caused you harm. Could you please just list the federal agencies involved in your claim? I can then provide addresses so that you can send your SF-95 to them. We will also continue to search for your claim.

I appreciate your assistance in making sure that the correct federal agency has received your claim.

Gail

**From:** Adam Wood <[adam.wood@gf-ac.com](mailto:adam.wood@gf-ac.com)>  
**Sent:** Friday, November 15, 2024 1:43 PM  
**To:** Johnson, Gail K. (CIV) <[Gail.K.Johnson@usdoj.gov](mailto:Gail.K.Johnson@usdoj.gov)>  
**Cc:** Adam Wood <[adamwood@alumni.harvard.edu](mailto:adamwood@alumni.harvard.edu)>  
**Subject:** [EXTERNAL] Re: FW: SF95 Update

Good Afternoon Ms. Johnson,

Thank you for taking a moment to send this note. I cannot tell you how much I appreciate something as simple as an email regarding this matter.

FYSA, I sent hard copies of the two (2) attachments into the Civil Branch via the USPS on 1OCT - delivered on 4OCT - because the nature of the claim involves both the Boston and Baltimore Field Offices as well as the WFO rising to the level of one of Director Wray's Special Advisors.

The text within the 1OCT2024 document includes over 100 witnesses from various sanctioned departments of government as well as other recognizable names who either had or have direct knowledge of the incident.

Please let me know how I can be more helpful or if I am needed in person for any future course of action as determined by the DOJ.

Thank you again for the email.

Adam Wood

On 11/15/24 1:23 PM, Johnson, Gail K. (CIV) wrote:

Dear Mr. Wood:

Thank you for your inquiry below about a Standard Form 95 that you submitted. Can you please tell me the name of the federal agency to which you sent your claim? If you could provide a copy of the claim, that would be helpful, too.

Gail  
Gail K. Johnson  
Supervisory Trial Counsel  
U.S. Department of Justice  
Federal Tort Claims Act Section  
Torts Branch, Civil Division  
Washington, D.C. 20044

**From:** [adam.wood@gf-ac.com](mailto:adam.wood@gf-ac.com) <[adam.wood@gf-ac.com](mailto:adam.wood@gf-ac.com)>  
**Sent:** Wednesday, November 13, 2024 4:19 PM  
**To:** Feedback, Civil <[cfeedbac@CIV.USDOJ.GOV](mailto:cfeedbac@CIV.USDOJ.GOV)>  
**Subject:** [EXTERNAL] SF95 Update

Good Afternoon,

I recognize that this may or may not be an opportune time to reach out, but it has now been 280 days since my home was raided, computer confiscated, and business destroyed as outlined in my SF95 claim.

It has also been approximately six (6) weeks since I remitted the SF95 with the 100+ witnesses associated with the aforementioned claim.

I suspect that the incoming administration would exploit the nature of my claim, use the details as political fodder when the DOJ is supposed to be apolitical, and, in turn, would ruin the careers of many of those witnesses named. I hope to hear from all of you so that we can resolve this matter with minimal damage.

Kind Regards,  
Adam Wood

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October 1, 2024

Dear Director,

My name is Adam Wood. The below will enumerate, iterate, and codify who I am, what has occurred, where it occurred, why it occurred, and the steps I've taken to remedy the matter to date.

**Summary**

It has been **eight (8) months** since the civil rights of my family were violated. To the best of my knowledge, it has been **fourteen (14) months** since the classified information associated with this matter was propagated in the public square by federal agents from the Boston Field Office and/or their CHS's. Since then, former USG executives that I'd hired to support the USG from the Goldman Sachs/NSC, CSEL - NSA/CYBERCOM/DIA/SPACERCOM, and SIS-4 - CIA have moved on with their lives unscathed with one of the representatives assuming responsibilities as the Deputy Director of USSOCOM. Whereas, I, a US citizen, have had my life upended; e.g., business destroyed, reputation damaged seemingly irreparably, and have yet to even receive communications concerning my computer and cell phone.

Like you, I am an American and I do not want to smear or stain my government whom I've tried so desperately to help. I have not notified the news media nor have I notified Congress, but I am struggling given the extent of the damages incurred. I deserved better than this. We all deserve better than this. As you may or may not know, I left Harvard University to help the USG. I rejected offers of employment from many organizations, including Robert Downey Jr. to support the USG. **No remedy has been offered or even discussed in eight (8) months. This is unacceptable.**

I do not take the filing of the SF95 lightly as it includes injuries that include negligence, discrimination, retaliation, tortious interference, and the violation of civil rights. It also includes a witness list of now over 100 names of government officials many of whom I know personally and do not want to drag their names through the mud. It is my hope that your office will consider the facts outlined herein. I have acknowledged that we all have a job to do and that there is a process relative to the execution of those duties. That said, I submit to you the following, because if this type of event can happen to me, I am deeply concerned about what that represents for the justice of others.

Respectfully,

Adam Wood

### INTRODUCTION

I'll be direct relative to the purpose of this note just as I have also notified Special Advisor for Cybersecurity to Director Wray, William "Mike" Herrington, Section Chief and Liaison to NSA/CYBERCOM, Mr. Jason Bilnoski (JB), and Assistant Director for Counterterrorism, Mr. David Scott (DS) regarding this matter. These discussions took place on 2/10/2024 (DS) and 2/20/2024 & 2/26/2024 (JB) and were based off of my notes memorialized following a two-hour plus long interview at my home in Maryland following a full-scale, military-style raid on the morning of February 7, 2024.

Empirical evidence was never what this matter was about. What it was always about was cyber intelligence that two (2) counterterrorism agents at the Boston Field Office didn't attempt to corroborate with SMEs gathered from technology that they are not qualified to understand. So what did they do? They asserted that the cyber intelligence pen-tested by TAO/CNO at NSA in 2018 was fake. When that explanation wasn't sufficient, they asserted that the technology was designed to deploy malware and spyware into USG systems absent evidence. Then they defaulted to calling the technology dangerous. They didn't contact FBI HQ to speak about the nature of SST's history of engagement with the FBI, NCIJTF, NSA, CIA, DOD, DOC, etc. They didn't speak with SMEs despite noting in person that they were, "Not computer people."

They didn't do anything even remotely close to what would qualify as conducting basic research concerning my education (Harvard University | Tufts University), professional history (Harvard Law School, National Bureau of Economic Research, Harvard Innovation Lab, Johns Hopkins, United Nations Secretary General work via UNITAR, Robert Downey Jr. and the DOD, US Navy), professional contacts, etc. As a US Citizen, whose home they justified raiding on the basis of their fears, arrogance, and incompetence. This level of incompetence is dangerous. Had any attorney from FBI HQ's OGC reviewed the justification and subsequent correspondence from Boston, they'd almost immediately object to the language used as it's anchored in speculation, hearsay, conjecture and prejudicial bias towards a foreign national of Israeli and Australian descent, Eden Levinson, whom the Special Advisor to Director Wray, Mike Herrington met on multiple occasions and was permitted in FBI spaces in April of 2022. The Boston Field Office did not coordinate any communications to validate the historical facts of the company and the lack of expertise in AI and cybersecurity stated by SA Paul Garaffo on February 7, 2024, demonstrates that oversight has once again failed.

Since February 7th, I have been harassed by local law enforcement, sneered at by my neighbors, and lost all business. I have not slept

through the night as I am constantly awoken by nightmares of what occurred on the morning of February 7th. The worst part of the situation is that the trust I held in my government has been broken. I am not the same person I was on February 6th.

That said, I have a family. I've tried to be measured and diplomatic throughout this matter. I have teenagers and pets and in-laws all of whom witnessed a grave injustice on the morning of February 7th both in person and captured on several video cameras inside and outside the house. Given the excessive show of force and tactics employed that day, when I'm asked by my 18 year old son that I've prepared for college and public service, "Why are they so bad at their jobs? They didn't know anything about you?" That, right there, I can no longer defend the FBI regardless of how much I revere the institution. I could have contacted the ACLU, Anti-defamation League, USAO, Congress, and sent the videos and this story to any major news media outlet. I did not do any of those things as I do not want any more stains on the FBI or the IC.

That said, we deserve an acceptable resolution and apology for this incident as does my family. Historically, the world has naturally been unkind to new technology, new talent. That's no excuse for what has occurred.

## FACTS

### Background

- From October 2021 through May of 2022, I introduced several high ranking members of the FBI's WFO/HQ - some of whom reported to the DAG, SESs at the Secret Service and Department of Homeland Security, and the Department of Defense to novel technology behind the firewalls of our primary adversaries.
  - This technology was created between 2013 and 2014 and established access to the infrastructure of the CCP, Russia, Iran as well as their surrogates critical infrastructure.
  - NSA's TAO/CNO pen-tested this technology in 2018-2019 and recommended that retired senior military officers establish a company in the United States to serve the USG exclusively.
  - In October and November of 2021, I notified the FBI's HQ that this capability had come to my attention and that I recommended it be seen/vetted by the Bureau and CIA.
  - The FBI's top cybersecurity advisor, William Herrington, to Director Wray met with the creator of this technology, Eden Levinson, in December of 2021 in the DMV and spoke

- frequently via Signal. I set this meeting up via Assistant Director of Counterterrorism, David Scott, FBI.
- o The FBI WFO/HQ invited myself, Eden, and other members of our team to brief in April/May of 2022 in the DMV and cited a potential IAA as a pathway forward to support the FBI, NSA, and CISA, via the NCIJTF.
  - o The JIATF-S was also interested in leveraging the tools to disrupt cartel infrastructure and the obfuscation of the CCP's fentanyl distribution points across the US.
  - o HAF/SAF CDM and the DIA's Strategic Competition Group knew of these efforts and sat with me on February 10, 2024, in Los Angeles with Robert Downey Jr., his wife, Susan Downey, and other members of his leadership to discuss helping the USG in combatting the CCP's narrative.
  - o SOCOM executed a CRADA at the recommendation of JSOC in March of 2023 with JSOC noting that the capabilities should be scaled to all TSOCS.
  - o I served on a joint forces innovation panel the morning the CRADA was executed with LTG Donahue and GEN Fenton at the USF - Dragon's Lair 8.
  - o Lt Gen Harris of the USAF Futures tapped A5/7 FIT/CDT and the 16<sup>th</sup> AF to run extensive due diligence from June 2023 - April of 2024 resulting in the technical director stating that the capabilities should be deployed enterprise-wide.
  - o From January 2024 - July of 2024, with the aid of Scott Stalker, retired CSEL at DIA/NSA/CYBERCOM/SPACERCOM, the USMC's Maj Gen Heritage, Maj Gen Matos, several SESs, and CSELS, stated that the capabilities should be leveraged for a global shaping operation, invested in Service-wide, and taken to every COCOM.
  - o The CTO of the DON agreed.
  - o Commerce's BIS actioned a pilot program in January of 2024.
  - o From April of 2024 - July 2024, the CIA validated endpoints and web access points to verify gaps in current capabilities and moved to dedicated communications devices internally with the Technology Management Office and Agency leadership.
  - o Members of the team included retired SOF, NSC, CSEL, SIS-4, and general officers.

I was never paid by the USG for any of this work. As a matter of fact, I took out loans from friends and family to support the USG.

THEN; February 7, 2024, the FBI's Boston and Baltimore Field Offices raided my home in Maryland:

- The Special Agent at the center of this case is Paul Garaffo of the Boston Field Office.
- Based off of interviews with former classmates of SA Garaffo, now attorneys, he has a documented history of overreach and utilizing any piece of circumstantial evidence to justify the

aforementioned, including leveraging unreliable information from CHSS.

- SA Garaffo and his CHS have spoken about the details of this sealed NSI to civilians who then placed that information into the public square resulting in quantitative damages dating back to August of 2023, at a minimum. I am speaking to only what I can prove and limiting myself to facts.
- SA Garaffo's first statement to me at my dining room table on the morning of 2/7/2024 was, "I am 110% confident that this intelligence is fake."
  - When asked if he coordinated any validation of the intelligence with the Cyber Division in Washington his response was, "No. We haven't spoken to anyone there."
  - Well, that could have prevented this entire ordeal, but since he failed to communicate - a basic skill - here we are.
  - This is negligence.
- Over the course of the next two (2) hours, I educated both he and SA Jared McCarthy on facts entered into the record below.
  - SA Garaffo was particularly arrogant in how he handled his questioning knowing nothing about my personal background, SST's capabilities, and history of the company itself including interactions with the WFO, CIA, and LTG Tovo, among other highly-decorated senior Army officers and SOF.
- Previously written, based on a phone call dated March 25<sup>th</sup>, SA Garaffo's memory has lapsed.
  - There was a clear and intentional delay in progress as were answering questions asked and answered several times.
  - SA Garaffo said then, "It's possible that we may have received some bad information."
  - There's been no accountability from the Boston Field Office nor Baltimore.
- Boston Field Office leadership has been complicit, allowing this investigation to continue despite the facts running counter to the assumptions posed, and yes, SA Garaffo has used verbiage in his emails such as "most likely" "we assume" and "presumably" with respect to Eden Levinson's relationship with the IDF, 8100, 8200, etc., none of which was true and therefore borders on discriminatory practices based solely on the allegation of the aforementioned, which, again, was never true or even remotely germane to this matter.
- SA Garaffo's speculation borders on the pathological most closely aligning with the Dunning-Kruger effect. I reiterate, this SA is dangerous as he has failed to conduct baseline research required to arrive at fundamental logic and reasoning - NEGLIGENCE that resulted in significant injury.
  - SST came to my knowledge in October of 2021.
  - The first person contacted as a result, Mr. David Scott, who then placed us in touch with Special Advisor to Director Wray, Mr. Herrington, as well as the SESS within the NCIJTF.

- o I ensured that CIA leadership tracked those communications due to venue.

I want to know what rational line of logic is realized when a person who has spent over a hundred thousand dollar on their education to put themselves in a higher level of competence to help the USG on matters of workforce development and workforce augmentation then goes directly to the FBI to attempt to defraud the nation's premier law enforcement agency and the CIA? I want to know what type of person turns down an Academy Award Winning Actor in Robert Downey Jr. to, at his own detriment, continue trying to help the USG understand the full scale of the capabilities and 702 support? The logical explanation is that no one with my education, experience, and contacts would do that.

#### **ADDITIONAL BACKGROUND**

- SA Garaffo stated on Monday, March 25, 2024, that, "It is possible that we, the FBI Boston Field Office, may have received bad information."
- As of April 8, 2024, he stated that he's speaking with various aspects of the U.S. Government about this matter, thus causing more damage - tortious interference.
  - o There is no basis for qualified immunity here - none.
  - o SA Garaffo and/or other federal agents leaked classified information to the public - known in August and September of 2023, but potentially prior to the confirmed timeline.
- SA Garaffo threatened to "charge" me with making False and Misleading Statements if I continued to attempt to offer explanations that appeared to run counter to his personal beliefs on the matter versus evidence, factual chronology of events, and material changes in circumstance over the 2 ½ year period of my direct involvement with SST.
- As a result, SA Garaffo and the Boston Field Office have opened the FBI up to significant exposure and legal recourse.

As stated, it has now been eight (8) months since the initial engagement with the Boston Field Office at my home with the tactical team from Baltimore on the morning of February 7, 2024, at 6:05am EST. I understand that there is a defined process associated with matters such as these; however, given the two and a half year history, dating back to October of 2021, of discoverable - documented, verifiable, and direct - communication between SST and the Washington FO (FBI HQ), the extensive interagency cooperation/validation of the authenticity concerning the technological capabilities with SMEs between the DOD, NSA (TAO/CNO), DHS, and DOJ with respect to the FOCI CI Assessment requested/conducted/accepted/cleared to proceed in April of 2022, and discoverable communication between all of the aforementioned parties with CIA to ensure proper visibility, communication, and venue concerning specific threats to the U.S. and its citizens, I am reaching out to assess an appropriate, end-state and pathway forward to resolve this matter.

Additionally, given the amount of time that's passed since SST was cleared of any and all FOCI questions and provided permission to proceed, I'd be remiss to note that, upon the conclusion of the CI Assessment in April of 2022, initiated/assessed/cleared to proceed by the NCIJTF and the JAIC - now CDAO, it was our understanding that SST had cleared an otherwise significant hurdle as not only no points of concern were raised by the investigative authorities conducting the assessment in Washington, but that all parties were given the all clear to proceed to engage in official business by the Security Offices at FBI Cyber and DOD. Subsequently, the Washington FO had expressed interest in discussing an IAA between the Bureau (Cyber), NSA/CYBERCOM, and CISA to pilot the capabilities observed - in person - over a duration of over six (6) months in duration prior to the Section Chief of Cyber going TDY (Mike Herrington, now Special Advisor to Director Wray) - all of which can be confirmed via email exchanges between Adam Wood ([adwood@law.harvard.edu](mailto:adwood@law.harvard.edu) [adamwood@fas.harvard.edu](mailto:adamwood@fas.harvard.edu) [adam.wood@sst-corporation.com](mailto:adam.wood@sst-corporation.com)), Eden Levinson, Ms. Sarah Pham, Ms. Shani Spivak, and Mr. David Scott's tapped SESSs.

The Boston Field Office - leadership and agents - were not aware of any of the above, because they simply did not communicate with the WFO Cyber Intelligence leadership nor the Intelligence Branch (IB), nor any other member of the IC, such as the CIA nor the NSA, nor the Pentagon. Had they done so, they would have been able to successfully corroborate the validity of SST's intelligence and FOCI mitigation produced via the Special Security Agreement (SSA) as well as the history of SST's documented cooperation with the WFO and DOD via FBI Cyber leadership to dispel any reasonable notion of a potential FCA violation or any other law for that matter. Furthermore, given the stated lack of domain expertise relative to computer literacy to validate such intelligence and cyber threats from SA Garaffo and SA McCarthy on the morning of February 7, 2024, the conclusions made in reference to the above were predicated upon assumptions anchored in speculation, hearsay, conjecture, and prejudicial bias are spurious at best. As such, there was no merit to conduct a search and seizure of a US Citizen's property and domicile as there was no evidence to support reasonable suspicion let alone probable cause and threats to national security to obtain said warrant.

The concerns outlined above and below demonstrates a pattern of tactics employed by the Boston Field Office agents and approving leadership that goes beyond general incompetence, which, in and of itself is dangerous enough across a spectrum of damages and other injuries. The bottom-line is that there are myriad of actions that have been taken in this matter by the Boston Field Office that rises to the level of abuse of power and abuse of process - among other infractions including government waste, misconduct, and civil rights violations that were not and are not justifiable in this case.

The Boston Field Office was also unaware as to the;

- Personnel on SST's team, to include;

- Former NSC - Director of DOD Intelligence and now Deputy Director of USSOCOM
- CSEL of NSA/CYBERCOM/DIA/SPACECOM
- SIS-4; CIA; and,
- Other senior and General Officers, LTG Tovo, Johnny Sawyer, and others.
- Existence of SST's corporate website (Yes, the agents didn't look at the company's website - they stated this on the morning 2/7/2024)
- Educational background of the COO (me) whose home/family was raided on February 7, 2024, in Maryland; and,
- My affiliation(s) and work with/at Harvard, Tufts, Johns Hopkins, the USG, Hollywood - Academy Award Winning Actor and associates, and the United Nations, because they didn't conduct research on LinkedIn, shoot me an email, or give me a call.
  - It wasn't until they saw my Harvard and Tufts IDs in my wallet that they decided to ask those questions.
- Costs of frozen/cold storage relative to cloud services
- How data lakes function
- How in-line collection and query inputs produces intelligence returns/analysis associated with those outputs
- A host of additional relevant data points germane to an investigation requiring evidence derived from basic research and the standard of due diligence
  - **They knew nothing and conducted a raid on my home** as a "first step fact-finding mission."
    - Yes, I'm quoting them.
    - Had they conducted a Google search on my name, they could have acquired all of this information - that is negligence.
    - At that point, you don't have reasonable suspicion let alone probable cause to do what was done here - that is abuse of process, abuse of power, and a violation of the 4<sup>th</sup> Amendment.
  - They knew nothing and it's not because they just operated off of poor information; it's also based in part that they did not research anything to corroborate or disprove that information, and most importantly, they did not communicate with FBI HQ, the POIs, or any relevant party.
  - Their actions - and those who approved of those actions - were incredibly reckless and could have resulted in a loss of life at my home.

It is because of these actions that I have no faith nor confidence in the Boston Field Office's abilities to conduct a legitimate legal investigation. I have also lost faith in the WFO given their unwillingness to intervene when they knowingly engaged with and used SST dating back to October/November of 2021. Due to their lack of general competence, willingness to skirt the laws this nation was built upon, and place civilians and their families in imminent danger

- civilians whose only objective is to support the national security interests of the USG - this matter must be escalated to a higher authority for oversight and security.

I say again, had the Boston Field Office conducted a cursory review of the above bullet points, that office could have avoided the need for obtaining search warrants, thus eliminating additional resource-intensive activities associated with the government serving those warrants, and conducted a more discreet and thorough investigation to reduce the extent to which those activities could potentially otherwise result in significant damages to the USG, end-users within the USG, SST, and its personnel. For whatever reason, they chose to go a different route and that route resulted in significant damages.

Further review, on February 6<sup>th</sup>, 2024, the Boston Field Office obtained search warrants for probable cause under seal applying national security for the basis of the aforementioned request, therefore preventing disclosure under the Freedom of Information Act. However, during the week of September 4<sup>th</sup>, 2023, a civilian notified me of the company concerning an ongoing FBI investigation (no specific field office was mentioned) citing the specific allegations relayed on February 7<sup>th</sup>, 2024, during the interview portion of the BFO search. What this evidence suggests is that - regardless of merit - either a) personnel from the Boston Field Office were openly discussing an ongoing national security investigation (NSI) with civilians, yet still found it appropriate to make requests for warrants under seal from a court of law or b) the CHS was openly discussing a NSI to others in the public. Either way, both A&B are illegal. **This disclosure is unlawful** and adds to the basis for a complete and thorough investigation into the agents and their leadership at the Boston Field Office as their actions are antithetical to the fidelity typically employed by the Bureau as a whole. These facts are concerning, and, although our position has consistently been, and continues to be one of support and abiding respect for the Bureau as an institution and its mission, it is irrefutable that the agents in question from the Boston Field Office have contributed to government waste, engaged in misconduct, abused their power and process, and violated the civil rights of a US Citizen in the process.

In summation, I state the following in the most tactful and diplomatic tone possible given the harrowing nature of the circumstances. Based off of the information exchanged and actions taken by the Boston Field Office to date, the Boston Field Office's understanding of SST origins, its technological capabilities, personnel, and painstaking efforts to support the U.S. government appears to be radically different than the foundation of facts vetted over the past six (6) years by various sanctioned departments of the U.S. government and, more specifically the six (6) months in duration w/FBI HQ from mid-October of 2021 to late-April of 2022 wherein SST routinely communicated and met with FBI HQ.

I am, and have been, equally confused about the substance of this case given the magnitude of due diligence conducted and the extent of the company's engagements by/with the U.S. government since 2018. I am even more confused and equally concerned with the fact that the Boston Field Office's CHS's claims, which lacks merit and supplied no concrete evidence clearly ignited unfounded assumptions that have contributed to speculation, conjecture, and hearsay easily disproven and was over two (2) years ago. The aforementioned claims have resulted in deliberate interference with, and significantly damaged SST's legitimate business operations in serving the USG's national security interests, which have been seriously undermined as a direct result of the mere existence of this case, but includes the disclosure of this NSI to civilians with no need to know dating back to August of 2023. At present, the damage done is both severe, quantifiable, and no longer tolerable.

Despite these facts and the sense of urgency that should otherwise be associated with those facts - preventing tragedies - given the value inherent in the institutional memory established and equal weighted value placed upon our relationships with the Bureau, we wanted to be respectful and afford the Boston Field Office some latitude to conduct and conclude this matter without intervention from FBI HQ - who we've been in contact with on this matter several times since February 10, 2024, and as recently as April 8, 2024 (Mike Herrington and David Scott via email).

I would hope that the Department of Justice would agree that we seek to serve the same mission as we have demonstrated our commitment to the same purpose time and time again - for years. It is clear to me now that the Boston Field Office has refused to accept that reality. That is not a reflection on the DOJ, rather that is a function of that specific office's own choices, not of evidence-based reality itself. Despite that, the FBI must be held accountable when it destroys the lives of the very citizens it swore an oath to protect. I am open to a discussion to resolve this matter and look forward to having that opportunity.

Very Respectfully,  
Adam Wood

**Initial Basis of SF95 Complaint: Negligence, Discrimination, Tortious Interference, Emotional Distress**

**COUNT I (TORTIOUS INTERFERENCE WITH BUSINESS RELATIONS)**

1. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through

2. Plaintiff had beneficial business relationships with the Department of Defense, the Intelligence Community, the Department of Commerce, and other sanctioned departments of the United States Government.

3. Defendant knew of these business relations.

4. Defendant intentionally interfered with Plaintiff's business relations for an improper purpose and by improper means.

5. Plaintiff was harmed by this interference.

**COUNT II (TORTIOUS INTERFERENCE WITH CONTRACTUAL RELATIONS)**

6. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through

7. Plaintiff had a contractual relationship with SPECIAL SUPPORT TECHNOLOGIES' prospective investors.

8. Defendant knew about this contractual relationship.

9. Defendant intentionally interfered with Plaintiff's contractual relationship for an improper purpose and by improper means.

10. Plaintiff was harmed by this interference.

**COUNT III (INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS)**

11. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through

12. Defendant intended, knew, or should have known that his conduct would cause Plaintiff emotional distress.

13. Defendant's conduct was extreme and outrageous, beyond all possible bounds of decency and utterly intolerable in a civilized community.

14. Defendant's conduct caused Plaintiff emotional distress.
15. The emotional distress caused was severe and of such a nature that no reasonable person could be expected to endure it.

**COUNT IV. (DISCRIMINATION - CIVIL RIGHTS ACT OF 1964)**

16. Plaintiff realleges and incorporates herein the allegations in paragraphs 1 through
17. Plaintiff had a contractual relationship with SPECIAL SUPPORT TECHNOLOGIES' prospective investors and US government.
18. Defendant knew about this contractual relationship.
19. Defendant intentionally discriminated against the Plaintiff's legitimate business activities relationship for an improper purpose and by improper means.
20. Plaintiff was harmed by this discrimination.

**SUMMARY of DAMAGES - AGGREGATE to COMPANY and PERSONNEL**

The sum total of personal damages would equal \$33,475,000.00.

**BASIS:** Longstanding and quantitatively-based precedent of government awards provided to vendors for enterprise-wide capabilities. Evidence supporting the desire of the aforementioned can be corroborated via witness testimony, written communication (emails) and text messages (Signal), ROMs - Actioned, and additional testimony as needed with respect to the Department of the Navy, including the Marine Corps, as well as the Department of the Air Force, Department of Commerce, National Security Agency, DARPA, SOCPAC, SOCCENT, PACOM, SOUTHCOM JIATF-S, USD (I) Hard Targets, Department of the Treasury - OFAC, and others within the IC.

- That witness list of 105 people - minimum.
- The witness list is not exhaustive.
- The list of witnesses was compiled in under five (5) minutes.
- A majority of the parties would testify that they expressed - in writing and/or verbally - of their desire to field SST's capabilities enterprise-wide, Service-wide, or Department-wide, and/or had actioned paid pilot programs or made introductions to parties who had expressed interest in the same.
- Stated evidence can be corroborated via documented written communication between the Claimant and witnesses exchanged via email, text messages, and joint testimony from former employees.

#### Claimant Witness List

1. David Scott, Assistant Director Counterterrorism, FBI
2. William "Mike" Herrington, Special Advisor to Director Wray, FBI
3. Sarah Pham, Special Agent, FBI
4. Shani Spivak, Intelligence Branch, FBI
5. Matthew Pedersen, Deputy Director - SOCOM (former NSC)
6. Laura Smith, CIA
7. Maura Burns, Chief Operating Officer - CIA
8. Mr. Lyons, Deputy Director (SAC) - CIA
9. TD R MC, CIA
10. TD C MC, CIA
11. Alex, Chief (TMO) - CIA
12. Lt Gen Harris - USAF Air Force Futures
13. MAJ David Zumbach - USAF A5/7 FIT/CDT
14. Ethan Crouse - MITRE Procurement and Acquisitions
15. Jon Stevens - USAF Acquisitions
16. Geoffrey Irving, Deputy General Counsel - DOC BIS
17. Justin Fanelli, Acting CTO - Department of the Navy
18. Master Guns Hollingshead, CSEL JTF ARES MARFORCYBER
19. MajGen Matos, CG MARFORCYBER
20. MajGen Heritage, Director of Operations - CYBERCOM
21. James Slater, J9 USMC/NSA
22. Shery Thomas, SES - USMC
23. CPT William Schimmel - USAF
24. Tony Porter, GG15 - UASF HAF/SAF CDM
25. COL Johnny Barnes - USAF
26. Gabriel VAUGHAN, Technical Director - USAF 35<sup>th</sup> AF/ACC
27. Brian Cook, Technical Director - USAF 16<sup>th</sup> AF
28. MAJ Jeremy Santino - USAF A5/7 FIT/CDT
29. Kimberly Carberry, PEO Lead - SOCOM
30. Doug Scott - ONA Capital
31. Ian Chrone - DARPA

32. Frank Sanders - USD (I)  
33. Theresa Whalen - USD (I)  
34. Jacqueline Page - USD (I)  
35. Tom, Adviser to CG - JSOC  
36. Terry, Adviser to MG Leahgy - CENTCOM  
37. Jon Rice, SIS-4 - CIA  
38. Scott Stalker - USMC CSEL NSA/CYBERCOM/CSS/DIA/SPACECOM  
39. Keith Couch - USMC  
40. Theresa Shea, NSA (Ret)  
41. Theresa Garner  
42. Mary Garner  
43. Malaki Saunders  
44. Armoni Ani  
45. General Allen - USMC (Ret)  
46. LTG Charlie Moore - USAF (Ret)  
47. LTC Chris Wood - USAF USD (I)  
48. Robert Dela Rosa - DIU  
49. Amanda Heller - DIU  
50. Noah Smith, Advisor to Director of NSA and PACOM  
51. Scott Salkeld - NSA C-Outcomes  
52. Pappy - NSA C-Outcomes  
53. Tracy - NSA C-Outcomes  
54. David Breed  
55. Hondo Guerts - USN  
56. Jake Windle - USN  
57. Aaron Windle - USN  
58. Tom McGuire - NSA  
59. Tim Teal - NSA  
60. Mark Mitchell - USA  
61. Johnny Sawyer - DIA Chief of Staff  
62. LTG Ken Tovo - USA  
63. MG Buck Elton - USAF  
64. MG Todd McCaffrey - USA  
65. COL Ross Davidson - USA  
66. COL Ron Minty - USA  
67. Sergeant Major Miguel Filpo - USA  
68. Amyn Jan, Chief Strategist - CIA S&T Directorate  
69. Dimitri Kusenov - DOE/DHS Undersecretary  
70. Khoi Nguyen - NSA  
71. LCDR Michael Klimkowski - USN  
72. Jock Padgett - DOD/CTO XVIII ABC  
73. Jeffrey Havlicek - SOUTHCOM JIATF-S CTO  
74. David Rader + Director of CFIUS - DOD  
75. BG Michelle Link - USA  
76. Nicholas Vandre - USA JSOC  
77. Michelle Isbell - USA JSOC  
78. Chris Humphrey - USA JSOC  
79. Lisa Sanders - SOCOM Director S&T  
80. CPT Chris Clarkin - USA  
81. SFC Bill Wilder - USA  
82. LTC Dustin Murphy, General Counsel - USASOC  
83. Rafa Sampayo - USA

84. COL Winfield Atkins - USA  
85. Scott McKeithen - USAF  
86. Neil Chaudry - DOI/DHS/GSA  
87. Malcolm - ONA Capital  
88. Stephanie Belistri - CIA New North Ventures  
89. Doowan Lee - USA  
90. Alex Creswell - GCHQ/MI5  
91. Sir Jeremy Fleming - GCHQ  
92. Scott Sperling - Lockheed Martin  
93. Robert Chung - Google  
94. Andy Kemp - HP + random law enforcement group\*  
95. Jason Porter - USA  
96. Charles Derrick - USA/Deloitte  
97. Damon Stern - SOCOM  
98. Quintan Wiktorowicz - MITRE  
99. Team CYMRU - Various members  
100. Morgan 6 - Various members  
101. Edge Theory - Various members  
102. Flashpoint - Various members  
103. Trellix - Various members  
104. Dark Wolf - Various members  
105. Radiant Technologies - Various members



INSURANCE COVERAGE		
<p>In order that subrogation claims may be adjudicated, it is essential that the claimant provide the following information regarding the insurance coverage of the vehicle or property.</p> <p>15. Do you carry accident insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance company (Number, Street, City, State, and Zip Code) and policy number. <input checked="" type="checkbox"/> No</p>		
<p>16. Have you filed a claim with your insurance carrier in this instance, and if so, is it full coverage or deductible? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>		<p>17. If deductible, state amount.  NONE</p>
<p>18. If a claim has been filed with your carrier, what action has your insurer taken or proposed to take with reference to your claim? (It is necessary that you ascertain these facts).  NONE</p>		
<p>19. Do you carry public liability and property damage insurance? <input type="checkbox"/> Yes If yes, give name and address of insurance carrier (Number, Street, City, State, and Zip Code). <input checked="" type="checkbox"/> No</p>		
INSTRUCTIONS		
<p><b>Claims presented under the Federal Tort Claims Act should be submitted directly to the "appropriate Federal agency" whose employee(s) was involved in the incident. If the incident involves more than one claimant, each claimant should submit a separate claim form.</b></p>		
<p>Complete all items - insert the word NONE where applicable.</p>		
<p>A CLAIM SHALL BE DEEMED TO HAVE BEEN PRESENTED WHEN A FEDERAL AGENCY RECEIVES FROM A CLAIMANT, HIS DULY AUTHORIZED AGENT, OR LEGAL REPRESENTATIVE AN EXECUTED STANDARD FORM 95 OR OTHER WRITTEN NOTIFICATION OF AN INCIDENT, ACCOMPANIED BY A CLAIM FOR MONEY</p>		
<p>DAMAGES IN A SUM CERTAIN FOR INJURY TO OR LOSS OF PROPERTY, PERSONAL INJURY, OR DEATH ALLEGED TO HAVE OCCURRED BY REASON OF THE INCIDENT. THE CLAIM MUST BE PRESENTED TO THE APPROPRIATE FEDERAL AGENCY WITHIN TWO YEARS AFTER THE CLAIM ACCRUES.</p>		
<p>Failure to completely execute this form or to supply the requested material within two years from the date the claim accrued may render your claim invalid. A claim is deemed presented when it is received by the appropriate agency, not when it is mailed.</p>		
<p>If instruction is needed in completing this form, the agency listed in item #1 on the reverse side may be contacted. Complete regulations pertaining to claims asserted under the Federal Tort Claims Act can be found in Title 28, Code of Federal Regulations, Part 14. Many agencies have published supplementing regulations. If more than one agency is involved, please state each agency.</p>		
<p>The claim may be filed by a duly authorized agent or other legal representative, provided evidence satisfactory to the Government is submitted with the claim establishing express authority to act for the claimant. A claim presented by an agent or legal representative must be presented in the name of the claimant. If the claim is signed by the agent or legal representative, it must show the title or legal capacity of the person signing and be accompanied by evidence of his/her authority to present a claim on behalf of the claimant as agent, executor, administrator, parent, guardian or other representative.</p>		
<p>If claimant intends to file for both personal injury and property damage, the amount for each must be shown in item number 12 of this form.</p>		
<p>The amount claimed should be substantiated by competent evidence as follows.</p>		
<p>(a) In support of the claim for personal injury or death, the claimant should submit a written report by the attending physician, showing the nature and extent of the injury, the nature and extent of treatment, the degree of permanent disability, if any, the prognosis, and the period of hospitalization, or incapacitation, attaching itemized bills for medical, hospital, or burial expenses actually incurred.</p>		
<p>(b) In support of claims for damage to property, which has been or can be economically repaired, the claimant should submit at least two itemized signed statements or estimates by reliable, disinterested persons, or, if payment has been made, the itemized signed receipts evidencing payment.</p>		
<p>(c) In support of claims for damage to property which is not economically repairable, or if the property is lost or destroyed, the claimant should submit statements as to the original cost of the property, the date of purchase, and the value of the property, both before and after the accident. Such statements should be by disinterested competent persons, preferably reputable dealers or officials familiar with the type of property damaged, or by two or more competitive bidders, and should be certified as being just and correct.</p>		
<p>(d) Failure to specify a sum certain will render your claim invalid and may result in forfeiture of your rights.</p>		
PRIVACY ACT NOTICE		
<p>This Notice is provided in accordance with the Privacy Act, 5 U.S.C. 552a(e)(3), and concerns the information requested in the letter to which this Notice is attached.</p>		
<p>A. Authority. The requested information is solicited pursuant to one or more of the following: 5 U.S.C. 301, 28 U.S.C. 501 et seq., 28 U.S.C. 2671 et seq., 28 C.F.R. Part 14.</p>		
<p>B. Principal Purpose: The information requested is to be used in evaluating claims. C. Routine Use: See the Notice of Systems of Records for the agency to whom you are submitting this form for this information. D. Effect of Failure to Respond: Disclosure is voluntary. However, failure to supply the requested information or to execute the form may render your claim "invalid."</p>		
PAPERWORK REDUCTION ACT NOTICE		
<p>This notice is solely for the purpose of the Paperwork Reduction Act, 44 U.S.C. 3501. Public reporting burden for this collection of information is estimated to average 6 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Director, Tort Branch, Attention: Paperwork Reduction Staff, Civil Division, U.S. Department of Justice, Washington, DC 20530 or to the Office of Management and Budget. Do not mail completed form(s) to these addresses.</p>		

0 Lb 8.60 Oz

RDC 01

FROM:

ADAM WOOD

302 Hibiscus Street

Taneytown, MD 21787

Received  
11/26/24

X-RAYED #3

OCT 04 2024

DOJ MAIL ROOM

DOJ-FASS



Tracking No: 420205309500110424914275636409

1100 L ST  
MAILROOM # CIVIL DIVISION - 1100 L  
STREET - 8TH - MAILROOM

Building:

Room:

Dept:

Received On: 10/04/2024 08:03:32am

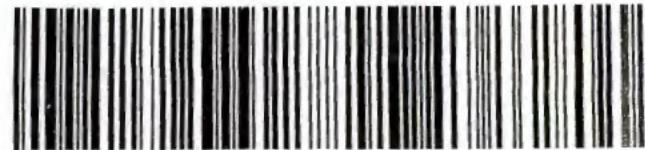
Route:

SHIP  
TO:

WASHINGTON DC 20530



USPS TRACKING® #



9500 1104 2491 4275 6364 09

TO:

U.S. Department of Justice  
Civil Division

950 Pennsylvania Ave NW  
Washington DC 20530-0001



## Attachment B



U.S. Department of Justice

Federal Bureau of Investigation

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Office of the General Counsel

Washington, D.C. 20535-0001

January 30, 2025

*via First Class Mail*

Mr. Adam Wood  
302 Hibiscus Street  
Taneytown, Maryland 21787

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Re: Administrative Tort Claim

Dear Mr. Wood:

This concerns your submission to the U.S. Department of Justice, Civil Division, of a Claim for Damage Injury or Death seeking money damages from the government pursuant to the provisions of the Federal Tort Claims Act (“FTCA”), 28 U.S.C. §§ 1346 (b), 2401 (b), and 2671, *et seq.* Specifically, your claim seeks \$33,475,000.00 in money damages for “Tortious Interference (2X), Civil Rights Violation(s), 4<sup>th</sup> Amendment and Title VII of the Civil Rights Act of 1964, and Non-economic damages,” which purportedly arose on February 7, 2024. As you were informed by letter from the Civil Division, Torts Branch, dated November 20, 204, your claim was forwarded to the Federal Bureau of Investigation (“FBI”), because it concerns alleged torts involving the FBI.

This is to inform you that your claim has been received by this office, where it will be reviewed pursuant to the provisions of the FTCA and Part 14 of the Code of Federal Regulations. Please direct any future correspondence concerning this matter to this office to the following e-mail address: HQ\_DIV09\_FTCA CLAIMS@FBI.GOV.

Sincerely,

Civil Litigation Unit II  
Office of the General Counsel  
FBI

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